

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|   |   |                           |
|---|---|---------------------------|
| KLEEN PRODUCTS LLC, <i>et al.</i> ,     | ) |                           |
| individually and on behalf of all those | ) |                           |
| similarly situated,                     | ) |                           |
|   | ) |                           |
| Plaintiffs,                             | ) | Case No. 1:10-cv-05711    |
|   | ) |                           |
| v.                                      | ) | Hon. Harry D. Leinenweber |
|   | ) |                           |
| INTERNATIONAL PAPER, <i>et al.</i> ,    | ) |                           |
|   | ) |                           |
| Defendants.                             | ) |                           |
|   | ) |                           |

**PLAINTIFFS' MOTION FOR LEAVE  
TO FILE MOTION IN EXCESS OF PAGE LIMITATIONS**

Plaintiffs move this Honorable Court for leave to file Plaintiffs' Motion for Final Approval of Settlement ("Settlement Motion") in excess of the 15-page limit set by Local Rule 7.1. In support of their Motion, Plaintiffs state as follows:

1. Plaintiffs request leave to file the Settlement Motion in excess of 15 pages for final approval of a proposed settlement agreement with Defendants Cascades Canada, ULC and its subsidiary Norampac Holdings U.S., Inc. (collectively, "Norampac").

2. Additional pages are requested to sufficiently describe the complexity of the proposed settlement agreement and how notice will be disseminated to class members. Specifically, the Settlement Motion will address (1) the procedural history of the litigation, (2) the terms and conditions of the proposed settlement agreement with Defendant Norampac, (3) the applicable standards for determining whether a proposed settlement is fair, reasonable, and adequate as to the settlement class, and (4) the procedures by which Plaintiffs will disseminate notice to class members.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file Plaintiffs' Settlement Motion exceeding 15 pages, but no more than 18 pages.

Dated: May 7, 2015

Respectfully submitted,

/s/ Michael J. Freed

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